

# EXHIBIT H



Drei Munar <j.drei.munar@gmail.com>

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## Alleyne

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**Robert Marinelli** <robmarinelli@gmail.com>  
To: Drei Munar <j.drei.munar@gmail.com>

Fri, Jul 22, 2016 at 1:58 PM

----- Forwarded message -----

From: **Rodriguez, Wilda (Law)** <wrodrigu@law.nyc.gov>  
Date: Fri, Jul 15, 2016 at 8:10 AM  
Subject: Re: Alleyne  
To: Robert Marinelli <robmarinelli@gmail.com>

Hi Mr. Marinelli,

My apologies for the delayed response. I have been out of the office. In regard to the amended complaint, please send me a copy of the proposed amended complaint. In terms of the seven additional detective depositions, my position on that still remains the same as in my June 30<sup>th</sup> letter. While Judge Scanlon extended the deadline, deposing everyone on the Tact. Plan is not only beyond the 10-limit rule but truly disproportional to the needs of this case and unduly burdensome. These additional depositions would not lead to anymore material information than already obtained.

Best regards,

**Wilda J. Rodriguez, Esq.**

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On Jul 13, 2016, at 4:09 PM, Robert Marinelli <robmarinelli@gmail.com> wrote:

Hi Wilda,

Can you let me know when you can produce D.I. Kenny, Sgt. Francis, Det. Ortega, Det. Valentine, Det. Santana. Det. Finnegan, and Det. Lafortune for depositions.

If there is an issue regarding your procuring their production, please let me know that as well.

Thanks.

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